

September 25, 2003

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: In the Matter of)	
Revision of the Commission's Rules to Ensure)	CC Docket No. 94-102
Compatibility with Enhanced 911 Emergency)	
Calling Systems)	

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules, William L. Ball, Vice President Public Policy, submits this notice in the above-captioned proceeding of an ex parte meeting on September 24, 2003, with Jason Williams, Telecommunications Specialist, and Sam Feder, Legal Advisor, Office of Commissioner Martin. The purpose of the meeting was to discuss OnStar's transition to digital technology and the December 3, 2002 Petition and February 7, 2003 Reply Comments filed by OnStar in the above captioned docket.

It was noted that analog is currently employed because that format permits voice and data to be transmitted on the same call. This capability is required in offering automatic airbag deployment notification, emergency and other location-based services and that the challenge in transitioning to digital is developing a robust data transport.

As a part of this discussion, it was noted that OnStar is currently a single transceiver based service in which prepaid interconnected wireless calling is an available option but only if the vehicle owner has first subscribed to the basic safety and security suite of call center services including the location-based emergency and automatic airbag deployment/crash notification (ACN) services. OnStar noted that it currently has over 2.0 million subscribers.

As set out in the petition and reply comments, OnStar is not a portable unit or a conventional handset. In this regard, three issues were noted:

- The unique need for the Phase II solution of an embedded telematics optional interconnected wireless calling to be interoperable across networks of all of a telematics service providers' wireless partners' networks;

- The need to reconcile the use of autonomous GPS with the use of Assisted GPS by CDMA carriers in developing their Phase II solutions; and
- The unique product lifecycle issues that occur because of embedded telematics being integrated into the electrical architecture of a vehicle.

OnStar suggested, as set forth in its pleadings, that collectively these considerations combined with OnStar's current nationwide location-based emergency and ACN telematics service capability differentiate its situation from the conventional handset around which the current E911 requirements were drafted. OnStar expressed the view that the requested ruling therefore represents sound public policy that supports the transition to digital by embedded telematics which are the only wireless service that offer nationwide location-based emergency services regardless of a PSAP's readiness for Phase I or Phase II calling.

OnStar noted that the requested clarification was recommended to be limited to only certain embedded telematics configurations. OnStar also discussed the Advanced Forward Link Trilateration (AFLT) capability that it expects to be available when any 911 call is placed by the optional wireless calling user from the first generation digital units. Finally, it was noted, as set forth in OnStar's filings, that OnStar is currently forwarding more than 6000 screened calls with location per month to public safety.

By contrast, OnStar noted that based on billing records fewer than 13 calls per day are placed to 911 by subscribers using its optional wireless calling service, and that these calls are inherently unscreened. It was noted that the call rate to 911 (less than 1.3 calls per 200,000 subscribed units) is significantly lower than the handheld wireless rate (about 1 per 1000) owing to the OnStar subscriber's access to location-based emergency services through the OnStar call center. Taken together these factors further assure the requested ruling should have a minimal impact.

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

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